



Theresa Kleinhaus <tess@loevy.com>

Terry v. County of Milwaukee; Deposition of Rusty Perry

Douglas Knott <dknott@lkglaw.net>

Mon, May 21, 2018 at 4:27 PM

To: Theresa Kleinhaus <tess@loevy.com>, "Russart, Michael P." <mrussart@hinshawlaw.com>

Cc: "Kugler, Mollie T." <MKugler@hinshawlaw.com>, Aisha Davis <aisha@loevy.com>, Scott Rauscher <scott@loevy.com>, Randy Arnold <rarnold@lkglaw.net>, Abraham Corrigan <abraham@loevy.com>

I can accommodate the week of the 4th other than Monday, June 4, and Wednesday, June 6—the latter because Margie Burton RN is scheduled in this case.

I would like to conduct the deposition of Ms. Terry either **Friday 5/1 or Tues, June 5**. I have asked for suggestions as to where she is located and what is convenient for you. Shall I notice her for this office?

Douglas S. Knott

Leib Knott Gaynor LLC

219 N. Milwaukee Street, Suite 710

Milwaukee, WI 53202

www.lkglaw.net

Direct: 414-276-2109

Cell: 414-416-9095

Fax: 414-276-2140



This message is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately.

[Case 2:17-cv-01112-JPS Filed 06/20/18 Page 1 of 11 Document 132-3](#)

either by phone (414-276-2102) or reply to this e-mail and delete all copies.

From: Theresa Kleinhaus [mailto:tess@loevy.com]

Sent: May 21, 2018 4:11 PM

To: Russart, Michael P. <mrussart@hinshawlaw.com>

Cc: Douglas Knott <dknott@lkglaw.net>; Kugler, Mollie T. <MKugler@hinshawlaw.com>; Aisha Davis <aisha@loevy.com>; Scott Rauscher <scott@loevy.com>; Randy Arnold <rarnold@lkglaw.net>; Abraham Corrigan <abraham@loevy.com>

[Quoted text hidden]

[Quoted text hidden]



Theresa Kleinhaus <tess@loevy.com>

Terry v. County of Milwaukee

Theresa Kleinhaus <tess@loevy.com>

Wed, May 23, 2018 at 5:01 PM

To: Douglas Knott <dknott@lkglaw.net>, "Russart, Michael P" <mrussart@hinshawlaw.com>

Cc: Aisha Davis <aisha@loevy.com>, Scott Rauscher <scott@loevy.com>, "Kugler, Mollie T." <MKugler@hinshawlaw.com>, Randy Arnold <rarnold@lkglaw.net>, Cory Brewer <cbrewer@lkglaw.net>

Counsel:

We can confirm that Ms. There's deposition can proceed on the afternoon of June 1. I have a doctor's appointment that morning that I cannot reschedule. If the afternoon of June 1 does not work, let us know and we will find another date. Thanks.

Tess



Theresa Kleinhaus <tess@loevy.com>

Terry v. County of Milwaukee

Douglas Knott <dknott@lkglaw.net>

Wed, May 23, 2018 at 8:18 PM

To: Theresa Kleinhaus <tess@loevy.com>, "Russart, Michael P" <mrussart@hinshawlaw.com>

Cc: Aisha Davis <aisha@loevy.com>, Scott Rauscher <scott@loevy.com>, "Kugler, Mollie T." <MKugler@hinshawlaw.com>, Randy Arnold <rarnold@lkglaw.net>, Cory Brewer <cbrewer@lkglaw.net>

We cannot commit to completing the deposition in less than the time permitted by the rules, but agree we should commence 6/1. Where will your client be produced?

Douglas S. Knott

Leib Knott Gaynor LLC

219 N. Milwaukee Street, Suite 710

Milwaukee, WI 53202

www.lkglaw.net

Direct: 414-276-2109

Cell: 414-416-9095

Fax: 414-276-2140



This message is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately either by phone (414-276-2102) or reply to this e-mail and delete all copies.

From: Theresa Kleinhaus [mailto:tess@loevy.com]

Sent: May 23, 2018 5:01 PM

To: Douglas Knott <dknott@lkglaw.net>; Russart, Michael P <mrussart@hinshawlaw.com>

Case 2:17-cv-01112-JPS Filed 06/20/18 Page 4 of 11 Document 132-3



Theresa Kleinhaus <tess@loevy.com>

Terry v. County of Milwaukee

Theresa Kleinhaus <tess@loevy.com>

Wed, May 23, 2018 at 10:04 PM

To: Douglas Knott <dknott@lkglaw.net>

Cc: "Russart, Michael P" <mrussart@hinshawlaw.com>, Aisha Davis <aisha@loevy.com>, Scott Rauscher <scott@loevy.com>, "Kugler, Mollie T." <MKugler@hinshawlaw.com>, Randy Arnold <rarnold@lkglaw.net>, Cory Brewer <cbrewer@lkglaw.net>

We are only producing her once. So we can do June 1 and start at noon and go up to the full seven hours. Or you can propose an alternative date.

We have no preference as to location.

Thanks.

[Quoted text hidden]



image002.jpg

4K



Theresa Kleinhaus <tess@loevy.com>

Terry v. County of Milwaukee

Theresa Kleinhaus <tess@loevy.com>

Mon, May 28, 2018 at 11:23 AM

To: Douglas Knott <dknott@lkglaw.net>

Cc: "Russart, Michael P" <mrussart@hinshawlaw.com>, Aisha Davis <aisha@loevy.com>, Scott Rauscher <scott@loevy.com>, "Kugler, Mollie T." <MKugler@hinshawlaw.com>, Randy Arnold <rarnold@lkglaw.net>, Cory Brewer <cbrewer@lkglaw.net>

Doug,

Please let me know whether you intend to go forward on Friday.

Thanks,

Tess

[Quoted text hidden]

Cc: Aisha Davis <aisha@loevy.com>; Scott Rauscher <scott@loevy.com>; Kugler, Mollie T. <MKugler@hinshawlaw.com>; Randy Arnold <rarnold@lkglaw.net>; Cory Brewer <cbrewer@lkglaw.net>
Subject: Terry v. County of Milwaukee

Counsel:

We can confirm that Ms. There's deposition can proceed on the afternoon of June 1. I have a doctor's appointment that morning that I cannot reschedule. If the afternoon of June 1 does not work, let us know and we will find another date. Thanks.

Tess



Theresa Kleinhaus <tess@loevy.com>

Terry v. County of Milwaukee

Douglas Knott <dknott@lkglaw.net>

Mon, May 28, 2018 at 12:35 PM

To: Theresa Kleinhaus <tess@loevy.com>

Cc: "Russart, Michael P" <mrussart@hinshawlaw.com>, Aisha Davis <aisha@loevy.com>, Scott Rauscher <scott@loevy.com>, "Kugler, Mollie T." <MKugler@hinshawlaw.com>, Randy Arnold <rarnold@lkglaw.net>, Cory Brewer <cbrewer@lkglaw.net>

We will go forward with the deposition on 6/1. Can you produce her in Milwaukee at noon?

Douglas S. Knott

Leib Knott Gaynor LLC

219 N. Milwaukee Street, Suite 710

Milwaukee, WI 53202

www.lkglaw.net

Direct: 414-276-2109

Cell: 414-416-9095

Fax: 414-276-2140



This message is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately either by phone (414-276-2102) or reply to this e-mail and delete all copies.

From: Theresa Kleinhaus [mailto:tess@loevy.com]

Sent: May 28, 2018 11:24 AM

To: Douglas Knott <dknott@lkglaw.net>

Case 2:17-cv-01112-JPS Filed 06/20/18 Page 8 of 11 Document 132-3

https://mail.google.com/mail/u/0/?ui=2&ik=ddf8260e50&jsver=k8XTJOJ1kuE.en.&cbl=gmail_fe_180606.07_p4&view=pt&msg=163a7d1f482e4fa6&as_query=fr... 1/3

Cc: Russart, Michael P <mrussart@hinshawlaw.com>; Aisha Davis <aisha@loevy.com>; Scott Rauscher <scott@loevy.com>; Kugler, Mollie T. <MKugler@hinshawlaw.com>; Randy Arnold <rarnold@lkglaw.net>; Cory Brewer <cbrewer@lkglaw.net>

Subject: Re: Terry v. County of Milwaukee

Doug,

Please let me know whether you intend to go forward on Friday.

Thanks,

Tess

On Wed, May 23, 2018 at 10:04 PM, Theresa Kleinhaus <tess@loevy.com> wrote:

We are only producing her once. So we can do June 1 and start at noon and go up to the full seven hours. Or you can propose an alternative date.

We have no preference as to location.

Thanks.

On Wed, May 23, 2018, 8:18 PM Douglas Knott <dknott@lkglaw.net> wrote:

We cannot commit to completing the deposition in less than the time permitted by the rules, but agree we should commence 6/1. Where will your client be produced?

Douglas S. Knott

Leib Knott Gaynor LLC

219 N. Milwaukee Street, Suite 710

Milwaukee, WI 53202

www.lkglaw.net

Direct: 414-276-2109

Cell: 414-416-9095

Fax: 414-276-2140

This message is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately either by phone (414-276-2102) or reply to this e-mail and delete all copies.

From: Theresa Kleinhaus [mailto:tess@loevy.com]
Sent: May 23, 2018 5:01 PM
To: Douglas Knott <dknott@lkglaw.net>; Russart, Michael P <mrussart@hinshawlaw.com>
Cc: Aisha Davis <aisha@loevy.com>; Scott Rauscher <scott@loevy.com>; Kugler, Mollie T. <MKugler@hinshawlaw.com>; Randy Arnold <rarnold@lkglaw.net>; Cory Brewer <cbrewer@lkglaw.net>
Subject: Terry v. County of Milwaukee

Counsel:

We can confirm that Ms. There's deposition can proceed on the afternoon of June 1. I have a doctor's appointment that morning that I cannot reschedule. If the afternoon of June 1 does not work, let us know and we will find another date. Thanks.

Tess



Theresa Kleinhaus <tess@loevy.com>

Terry v. County of Milwaukee

Theresa Kleinhaus <tess@loevy.com>

To: Douglas Knott <dknott@lkglaw.net>

Cc: "Russart, Michael P" <mrussart@hinshawlaw.com>, Aisha Davis <aisha@loevy.com>, Scott Rauscher <scott@loevy.com>, "Kugler, Mollie T." <MKugler@hinshawlaw.com>, Randy Arnold <rarnold@lkglaw.net>, Cory Brewer <cbrewer@lkglaw.net>

Mon, May 28, 2018 at 7:34 PM

Yes

[Quoted text hidden]



image002.jpg
4K